

**Air Resources Board
Workshop Summary
Architectural Coatings Suggested Control Measure**

Date: June 3, 1999

Location: Sacramento, California

Purpose: To present a staff update on progress on the Suggested Control Measure (SCM) since the last workshop on March 30, 1999. Also, to receive public comments primarily on the revised SCM's definitions and volatile organic compound (VOC) limits, or any other topic of concern to participants.

Attendees: The workshop was attended by over 50 people representing paint manufacturers, painting contractors and other users, equipment manufacturers, state agencies, laboratories, consultants, districts, and industry associations. (See the attached list of attendees.)

Key Points: General comments: ARB staff encouraged companies to schedule individual meetings to discuss issues of individual concern. Interest in using low vapor pressure solvents was mentioned, and the difficulties related to test methods were discussed. There were comments on whether a few of the compounds listed on the top ten VOCs in waterborne and solventborne coatings were really volatile. Staff agreed to check these data and clarified that these speciation data are not used to determine emissions, but would be used in the future for exploring reactivity-based standards. In response to questions, ARB clarified the reasons for updating the SCM at this time. Some industry representatives also commented that the process is going too fast.

Coating categories and VOC limits: There were several comments in support of including all the national rule categories in the SCM, plus those adopted recently by the South Coast Air Quality Management District (SCAQMD). Industry representatives maintained that no limit should be lower than in the SCAQMD rule, and that it is inappropriate for other districts to adopt SCAQMD limits without the averaging provision. They also believe that it is inappropriate to incorporate SCAQMD's VOC limits without first conducting the technology assessments committed to in SCAQMD Rule 1113. Painting contractors maintained that approving an SCM is not appropriate without performance studies. One manufacturer maintained that 50 grams per liter VOC limits were not feasible because of the error inherent in the test method at these low VOC levels. There was some interest in eliminating the "less water and exempts" requirement in VOC limits, because it unfairly penalizes manufacturers who make

water-based coatings. A suggestion was made to develop two tiers of standards: only the short-term limits would be adopted by the districts, while the second tier of standards would be subject to technology assessments in the year 2005. Another idea presented was that ARB assume responsibility for coordinating an averaging provision for the districts.

Individual VOC limits or definitions that were of concern to manufacturers were: brushing lacquers, graphic arts coatings, mastic texture coatings, roof coatings, bituminous primers, thermoplastic coatings, rust preventative coatings, masonry sealers, industrial maintenance coatings, anti-graffiti coatings, floor coatings, bathtub refinishing compounds, stain blocking primers, essential public services coatings, chemical and water storage and pipe lining coatings, and paints for bridges.

Rule language: Industry representatives asked that we match the SCAQMD and national rule language allowing labeling of the maximum VOC content for the coating. They asked that we delete the requirement for listing the coating category on the label. They also asked that we delete the provision that a coating not listed in the table of standards be classified as flat or nonflat based on its gloss.